A-23

FPL Energy Point Beach, LLC, 6610 Nuclear Road, Two Rivers, WI 54241

FPL Energy
Point Beach Nuclear Plant

March 23, 2009

NPL 2009-0074
WID 093 422 657

Paul Little, Chief
Compliance Section #2
USEPA, Region 5
RCRA Branch, Land & Chemicals Division
77West Jackson Boulevard
Chicago, IL 60604-3590

Prior Notice of FPL Energy Point Beach, LLC Name Change

FPL Energy Point Beach, LLC is pleased to provide you with prior notice, as a courtesy, that on the morning of April 16, 2009, its company name will be changed to NextEra Energy Point Beach, LLC. Our new company name better reflects our clean energy mission and market focus.

Our company will remain a Wisconsin limited liability company, as before. All other information and business aspects with respect to our company, including our company's ownership and function, office address, contact details, federal employer identification number (EIN), and data universal numbering system (DUNS) number issued by Dun and Bradstreet, are and will remain the same.

Following the completion of the name change on April 16, 2009, our new contracts, confirmations, invoices, notices and checks will be issued in our new company name.

Should you have any questions about this notice, or if there is any further information that you require from us in advance of the name change being completed, please contact me at 920/755-7427.

Very truly yours,

FPL Energy Point Beach, LLC

James Costedio
Licensing Manager

Land and Chemicals Division

Type of Document:
- ☐ Termination of Order
- ☐ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☑ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing Notice and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Other Correspondence

Facility Name: WE Energies Point Beach Station

Facility Location: 6610 Nuclear Rd.

City: Two Rivers **State:** WI

U.S. EPA ID#: WID 093 122 657

Assigned Staff: DERRICK HAMRANSKI **Phone:** 312-886-7812

Name	Signature	Date
Author	Derrick Hamranski	01/23/08
Section Chief Initial Review		1-25-08
Regional Counsel		
Section Chief Final Review		
RCRA Branch Chief	Willie Adams	1/24/08

Directions/Request for Clerical Support:

After the Section Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make three copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGIONS 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

JAN 25 2008

REPLY TO THE ATTENTION OF:

LR-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gene F. LeClair
Radioactive/Hazardous Waste Supervisor
WE Energies Point Beach Station
6610 Nuclear Rd.
Two Rivers, WI 54241

Re: WE Energies Point Beach Station
EPA I.D. No.: WID 093 422 657

Dear Mr. LeClair:

On August 28, 2007, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected WE Energies Point Beach Station (WE Energies) located in Two Rivers, Wisconsin. In response to violations of the Wisconsin Administrative Code (WAC) identified during the inspection, the U.S. EPA issued a Notice of Violation to you on November 28, 2007. Subsequent to the U.S. EPA's Notice of Violation, you submitted information regarding the identified violations in correspondence dated December 20, 2007.

This letter is to inform you that U.S. EPA has reviewed the referenced responses, and does not plan additional enforcement action at this time. This letter does not limit the applicability of the requirements evaluated, or other federal or state statutes or regulations. U.S. EPA and the Wisconsin Department of Natural Resources will continue to evaluate in the future.

If you have any questions or concerns regarding this matter, please contact Derrick Samaranski, of my staff, at (312) 886-7812.

Sincerely,

Willie H. Harris

Willie H. Harris, P.E.
Chief, RCRA Branch
Land and Chemicals Division

cc: Carol Schmidt, WDNR

mk 11-23-07

Waste, Pesticides and Toxics Division

Type of Document:
- ☒ Notice of Violation and Inspection Report/Checklist
- ☐ No Violation Letter and Inspection Report/Checklist
- ☐ Letter of Acknowledgment
- ☐ Information Request
- ☐ Pre-Filing and Opportunity to Confer
- ☐ State Notification of Enforcement Action
- ☐ Return to Compliance

Facility Name : WE ENERGIES POINT BEACH STATION

Facility Location: 6610 Nuclear Rd.

City: TWO RIVERS **State:** WI

U.S. EPA ID# WID 033 422 657

Assigned Staff DERRICK SAMARANSKI **Phone:** 312-886-7812

Name	Signature	Date
Author	Derrick Samaranski	11/07/2007
Regional Counsel		11/08/07
Section Chief		11/21/07
Branch Chief		

Directions/Request for Clerical Support:

After the Section Chief/Branch Chief signs this sheet and original letter:

1. Date stamp the cover letter;
2. Make four copies of the contents of this folder:
   - One copy for the assigned staff;
   - One copy for the section file;
   - One copy for the branch file; and
   - One copy for the official file.
3. Make any additional copies for cc's or bcc's.
4. Mail the original certified mail and distribute office copies and cc's and bcc's.

Once the certified mail receipt is returned:

5. File the certified mail receipt (green card), with this sign-off sheet and the official file copy, and take to 7th floor RCRA file room;
6. E-mail staff the date that the letter was received by facility.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

NOV 2 6 2007

LE-8J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gene F. LeClair
Radioactive/Hazardous Waste Supervisor
WE Energies Point Beach Station
6610 Nuclear Rd.
Two Rivers, WI 54241

Re: Notice of Violation
RCRA Compliance Evaluation Inspection
WE Energies Point Beach Station
EPA I.D. No.: WID 093 422 657

Dear Mr. LeClair:

On August 28, 2007, a representative of the United States Environmental Protection Agency (U.S. EPA) inspected WE Energies Point Beach Station (WE Energies) located in Two Rivers, Wisconsin. The purpose of the inspection was to evaluate WE Energies' compliance with certain provisions of the Resource Conservation and Recovery Act (RCRA); specifically, those regulations related to the generation, treatment and storage of hazardous waste. Please find enclosed a copy of the inspection report for your reference.

Based on the information provided by WE Energies personnel, review of records, and personal observations made by the inspector at the time of the investigation, U.S. EPA has determined that WE Energies is engaged in the management of hazardous waste without a hazardous waste storage license, and is in violation of the requirements of the Wisconsin Administrative Code and the United States Code of Federal Regulations (CFR). To be eligible for the exemption from the requirement to obtain a hazardous waste storage license, WE Energies must be in compliance with the conditions of the Wisconsin Administrative Code §§ NR 610.08(1)-(2), and (5) [40 CFR § 262.34(c) and (d)]. Specifically, we find that WE Energies is in noncompliance with the following condition for the storage license exemption:

1. In order to avoid the need for a hazardous waste storage permit, a small quantity generator accumulating hazardous wastes in satellite containers must keep the satellite containers at or near any point of generation where wastes initially accumulate. See WAC §§ NR 610.08(5)(a), 610.08(2) [40 CFR § 262.34(c)(1)].

At the time of the inspection WE Energies failed to keep three hazardous waste containers (55-gallon hexavalent chrome, 55-gallon lead, and 15-gallon spent ND-150 parts cleaner) stored in the outdoor shipping container at or near any point of generation.

2. In order to avoid the need for a hazardous waste storage permit, a small quantity generator accumulating hazardous wastes in satellite containers must designate an individual to be in charge of the area. See WAC §§ NR 610.08(5)(a), 610.08(2)(a)(1) [40 CFR § 262.34(c)(1)].

   At the time of the inspection WE Energies failed to designate an individual in charge of the outdoor shipping container storing the 55-gallon container accumulating wastes contaminated with hexavalent chrome, the 55-gallon container accumulating wastes contaminated with lead, and the 15-gallon container accumulating spent ND-150 parts cleaner.

3. A small quantity generator who accumulates hazardous waste on-site for less than 180 days, and who does not meet the conditions for a license exemption of WAC §§ NR 610.08(5)(a), and 610.08(1) and (2) [40 CFR § 262.34(c) and (f)] is an operator of a hazardous waste storage facility, and is required to obtain a hazardous waste storage license. See WAC §§ NR 610.08(5)(c); NR 680.30, 680.31 and 680.32(2) [40 CFR §§ 270.1(c), and 270.10(a),(d)]. Upon failing to comply with the conditions for a license exemption specified in Nos. 1 and 2 above, WE Energies violated the licensing requirements of WAC §§ NR 680.30, 680.31, and 680.32 [40 CFR §§ 270.1(c), and 270.10(a),(d)].

At this time, EPA is not requiring WE Energies to apply for either a Wisconsin storage license or U.S. EPA storage permit, so long as it immediately establishes compliance with the conditions for an exemption outlined above. Under Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. § 6928(a) U.S. EPA may issue an order assessing a civil penalty for any past or current violation and requiring compliance immediately or within a specified time period. Although this letter is not such order, you are hereby requested to submit a response in writing to this office no later than thirty (30) days after receipt of this letter documenting the actions, if any, which have been taken since the inspection to establish compliance with the above conditions and requirements.

You should submit your response to Derrick Samaranski, U.S. EPA, Region 5, 77 West Jackson Boulevard, LR-8J, Chicago, Illinois 60604. If you have any questions regarding this letter, please contact Derrick Samaranski of my staff at (312) 886-7812.

Sincerely yours,

Paul Little

Paul Little, Chief
Compliance Section #2
RCRA Branch
Land & Chemicals Division

Enclosures

cc: Patricia Chabot, WDNR
Carol Schmidt, WDNR

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Gene F. LeClair
WE Energies Point Beach Station
6610 Nuclear Rd.
Two Rivers, WI 54241

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Yvonne Elsen
B. Date of Delive: 1-29-08

C. Signature
X Yvonne Elsen
☒ Agent
☐ Address

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☒ No

Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☒ Return Receipt for Merchand
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. [illegible] *(Transfer from service label)* 7001 0320 0006 0292 7971

PS Form 3811, March 2001 Domestic Return Receipt 102595-01-M-

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
Attn: Derrick Samaranski LR-8J

SENDER: *COMPLETE THIS SECTION*

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Gene F. LeClair
WE Energies Point Beach Station
6610 Nuclear Rd.
Two Rivers, WI 54241

COMPLETE THIS SECTION ON DELIVERY

A. Received by *(Please Print Clearly)*: Shirley Hansen — B. Date of Delive: 11-28-07

C. Signature: X Shirley Hansen — ☐ Agent ☒ Addresse

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☒ No

vice Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☑ Return Receipt for Merchandis
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

2. Article Number *(Transfer from service label)* 7001 0320 0006 1448 5339

PS Form 3811, March 2001 — Domestic Return Receipt — 102595-01-M-14

UNITED STATES POSTAL SERVICE

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

U.S. EPA
77 W. Jackson Blvd
Chicago, IL 60604
Attn: Derrick Samaranski LR-8J

UNITED ENVIRONMENTAL PROTECTION AGENCY
REGION 5, WPTD, ECAB, DE-9J
77 W. JACKSON BOULEVARD
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME:	WE Energies Point Beach Station
EPA ID No.:	WID 093 422 657
ADDRESS:	6610 Nuclear Road Two Rivers, WI 54241
FACILITY TYPE/ PRIORITY SECTOR:	Nuclear Electric Power Generation
RCRA DESIGNATION:	Small Quantity Generator
NAICS CODE:	221113
FACILITY REPRESENTATIVES	Gene F. LeClair, Radioactive/Hazardous Waste Supervisor Roger Clark, Regulatory Affair Group
U.S.EPA INSPECTOR: **WDNR INSEPCTOR:**	Derrick Samaranski, LCD, RCRA, CS2 Carol Schmidt, Green Tier and Waste & Materials Management Coordinator
DATE OF INSPECTION:	August 28, 2007

PREPARED BY: Derrick Samaranski — **Derrick Samaranski** — 10/03/2007 — **Date Completed**

ACCEPTED BY: — **Paul Little, Chief**, **Compliance Section 2** — 10-10-07 — **Date**

Purpose of the Inspection:

The purpose of this inspection was to conduct a Compliance Evaluation Inspection (CEI) at the WE Energies Point Beach Station facility (WE Energies) for the management of its Resource Conservation and Recovery Act (RCRA) regulated waste. The inspection was conducted under a joint effort with the Wisconsin Department of Natural Resources (U.S. EPA lead inspection).

Facility Description:

The Point Beach Nuclear Power Plant is located in Two Rivers north of Milwaukee, Wisconsin, and is owned by WE Energies (formerly Wisconsin Electric Power Co.) The plant houses two pressurized water reactors, totaling 1,036 megawatts of capacity. Point Beach Unit 1 began commercial operation in December 1970; Unit 2 in October 1972.

Typical waste streams generated at the WE Energies plant include: hexavalent chrome waste from welding operations, waste paint from maintenance operations, aerosol wastes, sand blast grit, spent solvent from parts cleaning, ignitable liquids, corrosives, lab packs, and low level mixed radioactive waste. In addition to hazardous waste streams WE Energies also generates used oil from support building operations, and universal wastes such as: fluorescent lamps, batteries, and mercury.

WE Energies used analytical analysis, process knowledge, and Material Data Safety Sheets (MSDS) to characterize its hazardous waste streams. Table 1 lists WE Energies' hazardous waste streams:

Waste Type	Potential Hazardous Constituent/Characteristic	EPA Waste Code
Welding Waste	Chromium	D007
Waste Paint	Ignitability, Barium, MEK, Tetrachloroethylene, Trichloroethylene	F002, D001, D005, D035, D039, D040
Aerosol Waste	Ignitability	D001
Sand Blast Grit	Lead	D008
Parts Cleaner	Ignitability,	D001
Corrosive Wastes	Corrosivity, Chromium, Lead	D002, D007, D008
Waste Oil	Lead	D008
Ignitable Liquids	Ignitability, Acetone, Toluene	F005, D001

Table 1: Wastes Generated at the WE Energies Facility

On-site management of hazardous wastes at WE Energies facility consists of satellite accumulation in 55-gallon drums or smaller containers, and less than 180-day storage before disposal off-site. At the time of the inspection WE Energies identified six

hazardous waste management areas that include: satellite areas, one less than 180-day storage area, and one universal waste management area. On average the facility has two shipments of 1,500 lbs of hazardous wastes every year.

Facility Inspection and Observations:

For the inspection of WE Energies I was accompanied by Ms. Schmidt of the Wisconsin Department of Natural Resources. We arrived at the facility before 10:00 AM, proceed through the security checkpoint, and requested to speak with the facility's environmental coordinator. The security guard manning the front desk called Mr. LeClair, and I spoke briefly with Mr. LeClair, who told us that he was on his way to the plant and would meet with us in the security lobby.

Mr. LeClair arrived at 10:30 AM and was accompanied by Mr. Clark. After brief introductions and explanation of the purpose of our visit we were issued visitors badges and entered the facility.

During the opening conference I presented my official credentials and asked Mr. LeClair for a general layout map of the facility, description of the hazardous waste generation operations conducted at the plant including list of: waste streams generated and waste management areas. I also informed Mr. LeCalir that after the site walk-through I would conduct a records review. We also discussed WE Energies' management of mixed low radioactive/hazardous wastes and issues with visiting the controlled portions of the facility.

Facility Walk-through (Derrick Samaranski, Gene F. LeClair, Roger Clark, Carol Schmidt)

The site walk-through started at 11:31 AM, and began with the visit to the closet satellite area located in the office area of the facility. According to Mr. LeClair the closet satellite area serves as a collection point for hazardous waste aerosols (flammable locker), expired chemicals, and universal waste lamps. At the time of our visit the facility was only accumulating universal waste lamps and spent high intensity discharge bulbs. One of the three containers accumulating the universal waste lamps was not labeled with one of the acceptable phrases: "Universal Waste Lamps," "Waste Lamps,"or "Used Lamps."

Next, we continued the site walk-through by visiting facility's second satellite area located on the south side of the facility in the outdoor shipping container. The shipping container had no visible markings or labeling suggesting that hazardous wastes were accumulated inside the container. The shipping container was not located near or at the point of hazardous waste generation, and was not under the control of the operator. When Mr. LeCalir opened the shipping container we observed three containers accumulating hazardous wastes: one 55-gallon drum accumulating wastes contaminated with hexavalent chrome (gloves, overalls, PPE), one 55-gallon drum accumulating wastes contained with lead, and one 15-gallon container accumulating ND -150 parts cleaner. All of the containers accumulating the hazardous wastes were labeled as "Hazardous

Waste," were closed and still accumulating wastes. According to Mr. LeClair the hazardous wastes accumulated in the shipping container satellite area are generated in the clean portion of the facility, and are first accumulated in the closet satellite area and are then transferred to the drums in the shipping container.

From the shipping container satellite area we visited WE Energies less than 180-day hazardous waste storage area. The facility's hazardous waste storage area is located in the north part of the facility outside the fenced perimeter, and consists of shacks designated for the collection of hazardous waste, universal waste lamps, mercury devices, and lead acid batteries. During our visit to the facility's less than 180-day area WE Energies did not have any containers accumulating hazardous wastes; the facility had an offsite shipment of hazardous wastes on 08/06/2007. The universal waste shack had areas labeled and designated for the accumulation of Li, NiCd, NiMn, alkaline batteries, mercury devices, and universal waste lamps. The separate lead acid batteries trailer did not have labels indicating the type of waste being accumulated there, however at the time of our visit the facility did not have any batteries in the trailer.

Next, we visited the Mausoleum satellite area where we observed accumulation of used oil, sand blast grit, ND-150 spent solvent, hydrazine, and low radioactivity waste which included: evaporator bottoms, spent carbon and resin. The spent ND-150 solvent was accumulated in a 55-gallon drum that was closed and had a part of the hazardous waste label missing. According to Mr. LeClair the 55-gallon drum of spent ND-150 solvent was initially labeled as hazardous waste when it was generated, but after it was sampled in February of 2007, and tested in May of 2007 it was determined that the spent solvent was a non-hazardous waste, and the hazardous waste label was partially removed. The used oil was accumulated in seven 55-gallon drums all of which were labeled as "Used Oil" and were closed. The two 55-gallons of grit waste were sampled and the waste grit was determined to be non-hazardous.

The site walk-through ended with a visit to the controlled portion area of the facility where we visited two satellite areas designated for the accumulation of mixed low radioactivity/hazardous wastes and one of the two on-site labs. The wastes accumulated in the satellite areas are offered for disposal to a disposal facility that manages radioactive wastes. No issues of concern were noted as a result of our visit to the mixed waste satellite areas or the on-site lab.

Records Review (Derrick Samaranski, Gene F. LeClair, Carol Schmidt)

After conducting the site-walk through we briefly spoke with WE Energies personnel in charge of the two on-site laboratories Garry Correl and John Claus. Both labs conduct water analysis, ion chromatography, and inorganic metals analysis and as a result generate small amounts of spent or expired chemicals that are lab packed and offered for off-site disposal.

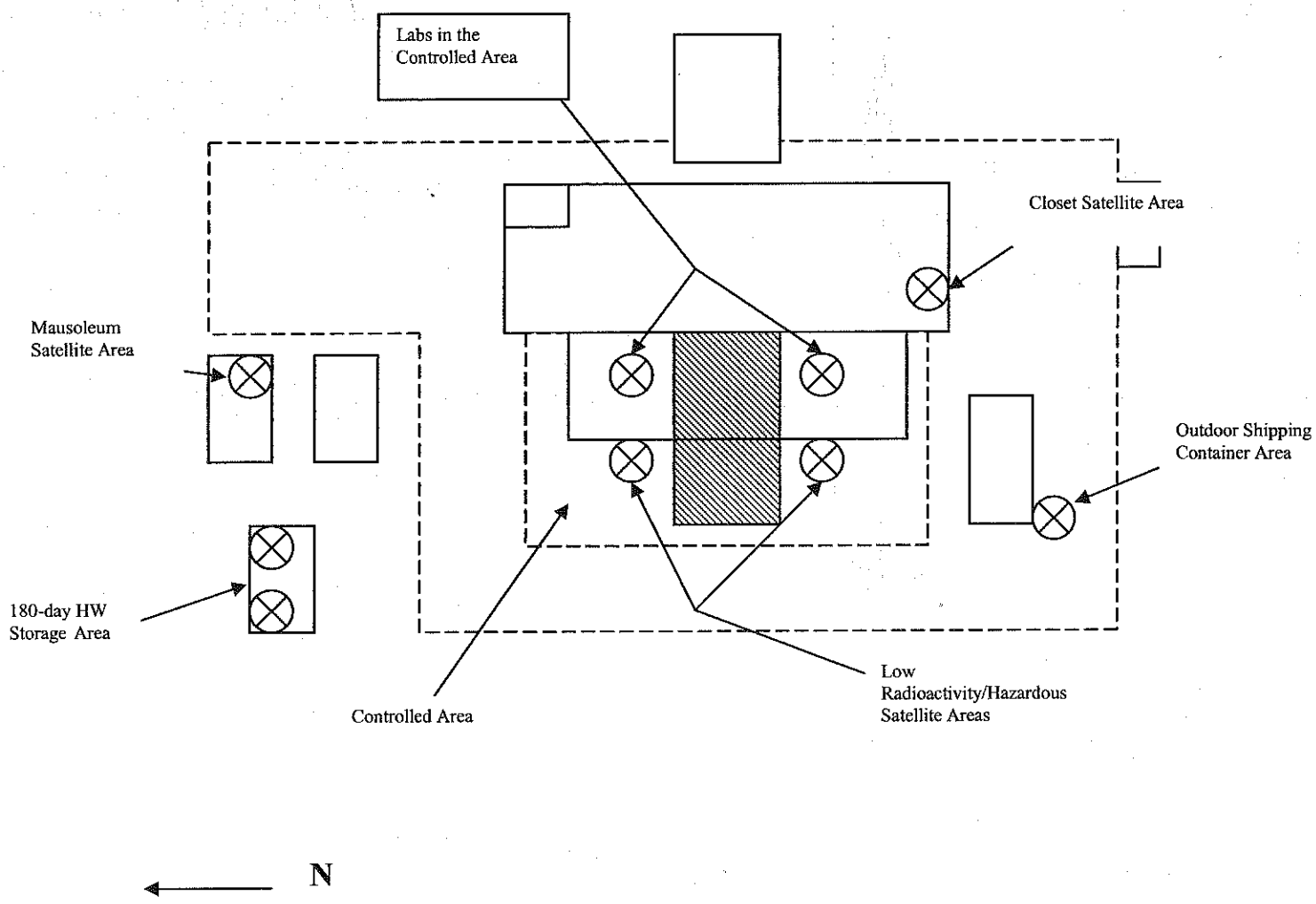
For the hazardous waste management records review at the WE Energies Plant I requested to see hazardous wastes manifests for the last three years of operation (2005,

2006, 2007), weekly inspection reports of the 180-day hazardous waste storage area, used oil shipment documents, waste analysis records, universal waste shipment documents, contingency plan, last three Annual Hazardous Waste Reports and Land Disposal Restriction forms. WE Energies ships its off-site hazardous waste to EOG Environmental, used oil to Jacobus Environmental, lead acid batteries to Salvage Battery and Lead, Inc., and universal wastes to Onyx. Mixed radioactive/hazardous wastes are managed as radioactive waste and are shipped to license disposal facility in Texas. Review of the available records did not reveal issues of concern.

Appendices

1. Facility Layout Diagram

Appendix 2: Facility Layout Diagram



State of Wisconsin
Department of Natural Resources
Hazardous Waste Management Program

Small Quantity Generator Inspection Report

Section A: Inspection Information

Inspection Date(s):	DNR Region:	~~DNR~~ Inspector(s):
08/28/2007		DERRICK SAMARANSKI

Section B: Generator Information

Generator Name	EPA ID Number	Facility ID (FID) Number
WI ELECTRIC POWER POINT BEACH	WID 093422657	

Street Address	City	ZIP Code	County
6610 NUCLEAR RD.	TWO RIVERS	54241	

Generator Contact Name	Title	Telephone Number (include area code)
Gene LECLAIR	Supervisor Radioactive/Hazardous Waste	920- 755 -6953

E-Mail Address:

Legal Owner Name	Telephone Number (include area code)
NMC - POINT BEACH NUCLEAR PLANT	

Street Address	City	State	ZIP Code

Personnel Present	Title
Gene Leclair	Radioactive/Hazardous Waste Supervisor
Roger Clark	Regulatory Affair Group

Generator's Main Product or Process

Nuclear Power Generation

Section C: Waste Information

Description of Waste Generated	Hazardous Waste Code	Generation Rate lbs/month	Receiving Facility	Analysis (Date)	Generator Knowledge (✓)
Welding Waste	D007	Varies	EDC Environmental		☒
Waste Paint	F002, D001 D005 D035, D039 D040	—11—	—11—		☒
Corrosive Wastes	D002, D007, D008	—11—	—11—		☒
Ignitable Wastes	F005, D001	—11—	—11—		☒

Note: All "NR" References are Wisconsin Administrative Code Chapters

NR 610.05(3)	1. Has a hazardous waste determination been made on each solid waste generated? Check the appropriate means of the determinations: ☒ Lab Analysis ☒ Generator knowledge (specify):	☒ Yes	☐ No
NR 605.12(1)	2. Were waste samples analyzed by certified, registered, or approved laboratories under NR 149? If YES, provide lab names and certification numbers.	☒ Yes	☐ No
NR 610.05(5)	3. Has a new waste analysis been made if the process generating the hazardous waste changed?	☐ Yes	☐ No ☒ N/A
NR 610.05(6)	4. Does the generator keep records of all waste determinations on-site for at least three years from the date the waste was last sent to a storage, treatment or disposal facility?	☒ Yes	☐ No
NR 610.08(1)(b)	5. Has the generator submitted a notification form and obtained an EPA ID#? Note: A subsequent notification should be submitted when there is an ownership or name change.	☒ Yes	☐ No

Section D: Manifest Requirements and Off-Site Shipments

NR 610.08(1)	1. Does the generator initiate a manifest with all off-site shipments of hazardous waste?	☒ Yes	☐ No
NR 610.08(8)	2. Is the manifest complete?	☒ Yes	☐ No
NR 615.08(3)	3. Does the manifest specify an approved facility to receive the waste?	☒ Yes	☐ No

NR 615.08(6)	4. Does the generator send a copy of the manifest to the Department and the receiving state within 5 business days of shipment?	☒ Yes ☐ No
NR 615.11(10)	5. Does the generator send a copy of the consignment state's manifest signed by the receiving facility to the Department within 5 business days of receipt?	☒ Yes ☐ No
NR 615.08(7)	6. Are copies of all manifests for the past 3 years retained on-site and available for review?	☒ Yes ☐ No
NR 610.08(1)(j) and (k)	7. Is the hazardous waste packaged, marked and labeled according to DOT requirements?	☐ Yes ☐ No ☒ N/A
NR 610.08(1)(L)	8. Does the generator offer the initial transporter appropriate placards?	☐ Yes ☒ No Transporter provided
Section E: Land Disposal Restrictions		
NR 675.07	1. Has the generator determined if each waste is prohibited from land disposal? ☐ Lab analysis ☒ Generator knowledge	☒ Yes ☐ No
NR 675.06	2. Does the generator comply with the prohibition against dilution of wastes?	☒ Yes ☐ No
NR 675.07(1)	3. Does the generator provide notification to the off site facility with each shipment?	☒ Yes ☐ No
NR 675.07 (1)	4. Check the appropriate type of LDR notification: ☐ Waste is subject to an EXEMPTION from a prohibition (i.e. case-by-case variances, 675.05(2) exemption, nationwide capacity variance) ☐ Waste MEETS treatment standards; certification that wastes may be land disposed without further treatment ☒ Waste EXCEEDS treatment standards; notice of appropriate treatment and applicable prohibitions	
NR 675.07 (1)(j)	5. Does the generator retain a copy of LDR notifications and certifications for 5 years?	☒ Yes ☐ No
NR 675.09 (1)	6. Have underlying hazardous constituents been identified for characteristic wastes?	☒ Yes ☐ No ☐ N/A
NR 675.09(2)	7. If the waste is both a listed and characteristic waste, are all of the treatment standards for the characteristic waste included in the treatment standards for the listed waste?	☒ Yes ☐ No ☐ N/A
NR 675.09(2)	8. If NO to No. 7, are the additional treatment standards for the characteristic waste identified?	☐ Yes ☐ No ☒ N/A
NR 675.20(4)	9. Are wastes with different treatment standards for a constituent of concern mixed?	☐ Yes ☒ No ☐ N/A
NR 675.20(4)	10. If YES to No. 9, is the most stringent treatment standard selected?	☐ Yes ☐ No ☒ N/A
Section F: Reporting		
NR 610.08(1)(g)	1. Have annual reports covering generator activities during the previous calendar year been submitted to the Department by March 1 of the following year?	☒ Yes ☐ No
NR 610.08(1)(h)	2. Are procedures for exception reporting followed?	☐ Yes ☐ No ☒ N/A
Section G: Preparedness and Prevention		
NR 630.21(2)	1. Does the generator have ALL of the following equipment, unless the equipment is not necessary for the types of wastes handled? ☒ A device to summon emergency assistance (e.g., telephone, 2 way radio) ☒ Internal communications and alarm systems ☒ Portable fire extinguishers ☒ Fire control equipment, including special extinguishing equipment ☒ Adequate spill control equipment ☒ Decontamination equipment (e.g., eyewash, shower)	☒ Yes ☐ No
NR 630.21(4)	2. Is all of the above emergency equipment tested and maintained to assure its proper operation in an emergency?	☒ Yes ☐ No
NR 630.21(3)	3. Is there immediate access to internal or external alarms in hazardous waste handling areas?	☒ Yes ☐ No

NR 630.21(6)	4. Has the generator made necessary arrangements with the following emergency organizations? ☒ Primary and support roles have been defined if multiple police and fire departments could respond to an emergency ☒ Familiarize police, fire and emergency response teams with the site layout, hazards of the waste handled, places where personnel work, entrances and roads in the site and possible evacuation routes ☒ Agreements with emergency response contractors and equipment suppliers to provide response ☒ Familiarize local hospitals with the properties of wastes handled and the potential resulting injuries or illnesses	☒ Yes ☐ No
NR 630.21(5)	5. Is adequate aisle space provided throughout the site to allow for the unobstructed movement of personnel and all emergency equipment?	☒ Yes ☐ No
Section H: Emergency Procedures		
NR 610.08(1)(w)1.	1. Has a person been identified as an emergency coordinator who is responsible for coordinating all emergency response measures and is on the premises or able to reach the site within a short period of time?	☒ Yes ☐ No
NR 610.08(1)(w)2.	2. Is ALL of the following information posted next to any telephone with an outside line that may be used when responding to an emergency? ☒ Name and telephone number of the emergency coordinator or the procedures for contacting that person ☒ The location of the nearest fire extinguisher, spill control material and fire alarm ☒ Telephone number of the fire department unless the generator has a direct alarm	☐ Yes ☒ No Facility has a Contingency Plan that includes the above info
NR 610.08(1)(w)3.	3. In the event of an emergency, will the emergency coordinator take the following actions? ☒ Activate internal alarms or communication systems ☒ Telephone the division of emergency government (1-800-943-0003) ☒ Call the fire department and attempt to extinguish the fire if appropriate ☒ Contain the flow of hazardous waste to the extent possible during a spill or discharge ☒ Take all reasonable measures necessary to ensure fires, explosions and discharges do not occur, reoccur, or spread ☒ Arrange for and complete cleanup of the hazardous waste and any contaminated materials or soils	☒ Yes ☐ No
NR 610.08(1)(w)4.	4. If there is a release that threatens human health outside of the generator site or if a spill reaches surface water, will the generator immediately notify the national response center and submit a written report?	☒ Yes ☐ No
Section I: Personnel Training Requirements		
NR 610.08(1)(u)	1. Are all employees properly trained and thoroughly familiar with proper waste handling and emergency procedures?	☒ Yes ☐ No
NR 610.08(1)(v)	2. If the generator accumulates greater than 1,000 kg of waste, are the following records kept at the site? ☐ A written description of the training program ☐ Documentation that training has been given to employees ☐ Documentation that training has been reviewed annually	☐ Yes ☐ No NA
Section J: 180-Day Container Accumulation		
	1. Does the generator accumulate hazardous waste in containers? If NO, go to Section K.	☒ Yes ☐ No ☒ N/A
NR 610.08(1)(n)9.	2. Are all containers marked with the starting date of accumulation?	☐ Yes ☐ No ☒ N/A
NR 610.08(1)(n)1a	3. Are all containers accumulated for: ☒ 180 days or less? ☐ 270 days or less if the waste is shipped 200 miles or more?	☒ Yes ☐ No
NR 610.08(1)(n)2.c.	4. If the containers are accumulated for 270 days or less, does the generator have written documentation on why the selected off-site facility was chosen?	☐ Yes ☐ No ☒ N/A

NR 610.08	5. Does the generator accumulate less than 6,000 kg (13, 230 lbs) at any time?	☒ Yes ☐ No
NR 610.08(1)(k)1	6. Are all containers marked with the words "Hazardous Waste" or other words that identify the contents as hazardous waste?	☐ Yes ☐ No
NR 610.08(1)(o)3.	7. Are all containers of hazardous waste in good condition?	☐ Yes ☐ No
NR 610.08(1)(o)8.	8. Are all containers made of or lined with materials that are compatible with the waste?	☐ Yes ☐ No
NR 610.08(1)(o)5.	9. Are all containers kept closed, except when it is necessary to add or remove waste?	☐ Yes ☐ No
NR 610.08(1)(o)6.	10. Are containers opened, handled or stored to prevent leaks or ruptures?	☐ Yes ☐ No
NR 610.08(1)(o)1.	11. Are containers and accumulation areas inspected weekly for leaks and defects?	☒ Yes ☐ No
NR 610.08(1)(o)2.	12. Are the inspections recorded into a log which includes ALL of the following? ☒ Date and time of inspection ☒ Name of inspector ☒ Notation of the observations made ☒ Date and nature of repairs or remedial actions	☒ Yes ☐ No
NR 610.08(1)(o)2.	13. Are the inspection records kept for at least 3 years from the date of the inspection?	☒ Yes ☐ No
NR 610.08(1)(n)4.	14. If a container begins to leak, are the contents immediately removed and placed in a leak proof container?	☐ Yes ☐ No ☒ N/A
NR 610.08(1)(o)7.	15. Are containers of incompatible wastes separated or protected from each other by a physical barrier (dike, berm, wall or other device)?	☒ Yes ☐ No ☐ N/A
NR 610.08(1)(o)11.	16. Are incompatible wastes stored in separate containers?	☒ Yes ☐ No ☐ N/A
NR 610.08(1)(o)10.	17. Are containers that previously held an incompatible waste properly washed before adding waste?	☐ Yes ☐ No ☒ N/A
Section K: Satellite Accumulation		
	1. Does the generator accumulate waste at or near the generation point? If NO, go to Section L.	☒ Yes ☐ No * See comment
NR 610.08(2)(a)2.	2. Are the containers in good condition?	☒ Yes ☐ No
NR 610.08(2)(a)4.	3. Are the containers always kept closed except when it is necessary to add or remove waste?	☒ Yes ☐ No
NR 610.08(2)(a)5.	4. Are containers opened, handled or stored to prevent leaks or ruptures?	☒ Yes ☐ No
NR 610.08(2)(a)6.	5. Are all containers made of or lined with materials that are compatible with the waste?	☒ Yes ☐ No
NR 610.08(2)(a)7.	6. Are the containers marked "hazardous waste" or other words that identify the contents?	☒ Yes ☐ No
NR 610.08(2)	7. Does the generator accumulate no more than 55 gallons of hazardous waste or 1 quart of acute hazardous waste in each satellite area?	☒ Yes ☐ No
NR 610.08(2)(a)8.	8. Are the containers immediately marked with the date the excess amount is generated?	☒ Yes ☐ No
NR 610.08(2)(a)8.	9. Does the generator comply with the 180 day accumulation requirements with respect to the excess amount within 3 days of it being generated?	☒ Yes ☐ No
Section L: Accumulation in Spill Containment Tank		
	1. Does the generator accumulate hazardous waste in a spill containment tank? If NO, go to Section M	☐ Yes ☒ No
NR 610.08(3)	2. Does the generator comply with the following: ☐ Tank is empty unless a spill occurs ☐ All hazardous waste is removed within 24 hours or at the earliest practicable time ☐ Generator complies with applicable tank standards	☐ Yes ☐ No N/A
Section M: Stabilization with Absorbent Material		
NR 610.08(4)	1. Does the generator combine absorbent material with hazardous waste for the purpose of eliminating free liquids? If YES, see NR 610.08(4).	☐ Yes ☒ No

ion Comments. Add comments on additional pages if necessary.

* Outdoor satellite are not near point of generation and not under control of the operator.

DNR Inspector Signature:	Date:

Section N: Waste Minimization Certification

NR 610.08(1)(e) 1. Has the small quantity generator made a good faith effort to minimize the amount of waste generated? ☒ Yes ☐ No

Section O: Universal Waste Management

Are universal wastes generated at the site? If NO, go to Section P. ☐ Yes ☐ No

Waste Type	Quantity Generated	On-Site Storage	On-Site Treatment (List)	Shipped to handler/destination facility (List)

Note: Management of CRTs and antifreeze, as per department guidance, should also be discussed with the generator.

NR 690 Such. II 1. Does the generator comply with the small quantity handler requirements if <5,000 kg/yr is accumulated? ☒ Yes ☐ No ☐ N/A

NR 690 Subch. III 2. Does the generator comply with the large quantity handler requirements if >5,000 kg/yr is accumulated? ☐ Yes ☐ No ☒ N/A

NR 690.64(2) 3. If the universal waste is not recycled, has the generator complied with the applicable NR 600-685 requirements? ☐ Yes ☐ No ☐ N/A

Section P: Generator Status Evaluation

1. Is the Small Quantity Generator status confirmed by this inspection? ☒ Yes ☐ No

2. If No, what is the correct generator classification?
☐ Non-Generator ☐ Very Small Quantity Generator ☐ Large Quantity Generator

3. Are there any other on-site hazardous waste activities at the generator's location? ☐ Yes ☒ No

4. If YES, check all that apply.
☐ Accumulation in Tanks ☐ Recycling ☐ Transfer ☐ Transporter ☐ Treatment ☐ Storage ☐ Disposal